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February 12, 2025

Via ECF

The Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Charles v. Pinnacle Too, LLC., et al.*
Case No.: 22-CV-4232 (DEH)(JW)

Dear Judge Willis:

We are counsel to Plaintiff in the above referenced matter. We write in response to the Motion to Withdraw as Attorney as counsel for Defendants Pinnacle Too, LLC, Agir Electrical Ltd., and Antony Gironta (collectively, the “Pinnacle Defendants”), filed by Simi Bhutani, Esq., and the request to stay the case for 45 days following entry of an order relieving her firm (Dkt. No. 170).

Plaintiff does not oppose the request of current counsel to Pinnacle Defendants to be relieved and there is no need for a motion. Plaintiff is willing to enter a stipulation with Pinnacle Defendants.

Regarding the request for a stay, Plaintiff requests that the Court not stay the distribution of the class notice (Dkt. No. 155), so that Plaintiff can proceed to notify class members that the class action has been certified.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties via ECF